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OF COUNSEL:

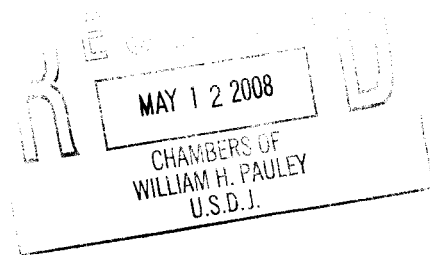
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May 13, 2008

MEMO ENDORSED

VIA FACSIMILE: (212) 805-6390

The Honorable William H. Pauley
United States District Judge
Southern District of New York
500 Pearl Street, Suite 2210
New York, New York 10007



RE: United States of American v. Ahmad Awadallah
08 Cr. 215 (WHIP)

Dear Judge Pauley,

Please be advised that my office is counsel to Mr. Awadallah on the above referenced matter.

As Your Honor is aware, on May 12, 2008 we had a lengthy discussion on the record regarding my office's application to return Mr. Awadallah's passports for the purpose of allowing him to travel to Israel to see his terminally ill father. On said date Your Honor denied our initial application and requested that we submit a more detailed travel request.

Late last night Mr. Awadallah received a call from one of his brothers, explaining that they believe it will be any day before their father succumbs to his illnesses. Currently Mr. Awadallah's father is suffering from severe heart and lung failure that has resulted in his inability to speak and has required emergency leg amputation. As mentioned, Mr. Awadallah's father is bed ridden and doctors have advised the family that their father's death is imminent.

As such, we are respectfully requesting a return of both of Mr. Awadallah's passports for the purpose of allowing him to return to Israel with the intention of seeing his father while he is still alive. While Mr. Awadallah has expressed to me that he is not certain whether his father will make it in time for his visit, he is respectfully requesting permission to leave on Friday May 16, 2008 and return on Friday May 23, 2008. Mr. Awadallah has informed me that if Your Honor is so inclined to grant this application, he hopes to book the Continental flight which departs from Newark International Airport in

L A W O F F I C E S O F**Murray Richman**

New Jersey on May 16, 2008 at 4:05 p.m.(Flight CO84) and return on the Continental flight that lands in Newark on May 23, 2008 at 4:50 p.m.(Flight CO85).

It is our sincere belief that Mr. Awadallah is by no means a flight risk. Along with the \$20,000 Appearance Bond currently outstanding, he has strong family ties here in New York. He resides in Rockland County with his wife Flora and three children, Abraham, Miriam and Nora. Mr. Awadallah's brother, Bahjat Awadallah resides in Allentown Pennsylvania with his wife and two children. Furthermore, Mr. Awadallah currently owns his home in Rockland County which he estimates is valued at over \$600,000.00.

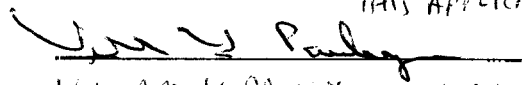
As far as Your Honor's inquiry as to what ties Mr. Awadallah has to Israel, he has informed me that he has three brothers and three sisters who currently reside in the Village in Israel where his father is hospitalized.

I have communicated with AUSA Kasulis and he has indicated no objection to this request.

Respectfully Submitted,


Brian Pakett, Esq.

THE DEFENDANT MAY TRAVEL TO ISRAEL ON
MAY 16, 2008 AND RETURN TO THE USA ON MAY
SO ORDERED: 23, 2008. DEFENDANT IS TO PROVIDE
A CONTACT NUMBER IN ISRAEL.
THIS APPLICATION IS GRANTED ON


WILLIAM H. PAULEY III U.S.D.J. GOVERNMENT
MAY 14, 2008

CC: AUSA Telemachus P. Kasulis
VIA FACSIMILE: (212) 637- 2527